

IN THE UNITED STATES DISTRICT COURT
IN THE SOUTHERN DISTRICT OF NEW YORK
Case No. 22-cv-10336 (AT)(GWG)
[rel. 20-cv-3389]

Local 2507, UNIFORMED EMTs,
PARAMEDICS & FIRE INSPECTORS,
individually and on behalf of its
current and former members; et al.,

Plaintiffs,
vs.

CITY OF NEW YORK on behalf of the Fire
Department of the City of New York,

Defendant.

VIDEO CONFERENCE DEPOSITION OF
JOHN M. ESPOSITO
30(b)(6) WITNESS

May 15th, 2023
Via Video Conference
10:01 a.m. - 5:15 p.m.

Reported by:
MARCIA L. ALF, R.P.R.
Notary Public
Job SY007236

1 something inside the building is on fire to be
2 considered a structural fire?

3 MS. MINICUCCI: Objection. You can answer.

4 THE WITNESS: Both would be considered
5 structural fires. A fire in a building, inside
6 the building and a fire that has communicated to
7 the building components.

8 BY MS. KURLAND:

9 Q. Could you explain more?

10 So for example, I'm assuming but please
11 correct me if I'm wrong, something like a grease fire
12 in a frying pan would not be considered a structural
13 fire, is that correct?

14 MS. MINICUCCI: Objection. You can answer.

15 THE WITNESS: It depends on where that grease
16 fire in the frying pan is located.

17 BY MS. KURLAND:

18 Q. So it's possible it could be considered a
19 structural fire?

20 A. Yes.

21 Q. So if you could just -- who makes the
22 determination that it is a structural fire or
23 nonstructural fire?

24 MS. MINICUCCI: Objection. You can answer.

25 THE WITNESS: If the fire's located in or on